

**IN THE
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|---------------------------------|---|-----------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| |) | No. 18 CR 249 |
| v. |) | |
| |) | Judge Charles Norgle |
| DUSHAUN HENDERSON-SPRUCE |) | |
| |) | |

MR. HENDERSON-SPRUCE’S MOTION FOR PRETRIAL RELEASE

Defendant DUSHAUN HENDERSON-SPRUCE, by the Federal Defender Program and its attorney AMANDA G. PENBAD, respectfully requests that this Court grant his motion for pretrial release. In further support of this motion, Mr. Henderson-Spruce states as follows:

1. Mr. Henderson-Spruce has been charged by indictment with various counts of fraud. He is schedule to appear for arraignment on Wednesday, June 5, 2018.
2. On May 5, 2018, Mr. Henderson-Spruce appeared before Magistrate Judge Gilbert for an initial appearance. Mr. Henderson-Spruce initially opposed the government’s motion for detention, but on May 21, 2018, Mr. Henderson-Spruce withdrew his opposition without prejudice to raising bond in the future.
3. Mr. Henderson-Spruce now moves this Court for release pending trial. In the instant motion, he presents a new proposal for the conditions of his release.
4. Mr. Henderson-Spruce has located suitable housing in a community home run by the non-profit New Beginnings. This residence, located on the south side of Chicago, offers subsidized rent, meals, group therapy, and medical staff on site. Counsel for Mr. Henderson-Spruce has provided contact information for the non-profit to the

assigned pretrial services officer, Judith Lesch, so that pretrial may provide a supplemental report.

5. According to the initial pretrial services report, Mr. Henderson-Spruce has no prior convictions. He does not present a danger to the community.
6. Counsel for Mr. Henderson-Spruce is prepared to discuss the potential risks of non-appearance raised by Ms. Lesch in the initial pretrial services report. It is undersigned counsel's belief that conditions may be fashioned that will assure the Court that Mr. Henderson-Spruce does not present a risk of flight.

WHEREFORE, for all the reasons stated herein, Mr. Henderson-Spruce respectfully moves this Court for release from custody pending trial in this matter, subject to any conditions this Court deems appropriate.

Respectfully submitted,

FEDERAL DEFENDER PROGRAM
John F. Murphy,
Executive Director

By: /s/ Amanda G. Penabad
Amanda G. Penabad

AMANDA G. PENABAD
FEDERAL DEFENDER PROGRAM
55 East Monroe Street, Suite 2800
Chicago, IL 60603
(312) 621-8340
Amanda_Penabad@fd.org

CERTIFICATE OF SERVICE

The undersigned, Amanda Penabad, an attorney with the Federal Defender Program hereby certifies that in accordance with FED. R.CIV.P5,LR5.5, and the General Order on Electronic Case Filing (ECF), the following documents(s):

MR. HENDERSON-SPRUCE'S MOTION FOR PRETRIAL RELEASE

Was served pursuant to the district court's ECF system as to ECF filing, if any, and were sent by first- class mail/ hand delivery on **June 5, 2018**, to counsel/ parties that are non-ECF filers.

By: /s/Amanda G. Penabad
Amanda G. Penabad
FEDERAL DEFENDER PROGRAM
55 E. Monroe St., Suite 2800
Chicago, Illinois 60603
(312) 621- 8300